

1 ORRICK, HERRINGTON & SUTCLIFFE LLP
KAREN G. JOHNSON-MCKEYAN (SBN 121570)
2 kjohnson-mckewan@orrick.com
ANNETTE L. HURST (SBN 148738)
3 ahurst@orrick.com
GABRIEL M. RAMSEY (SBN 209218)
4 gramsey@orrick.com
405 Howard Street, San Francisco, CA 94105
5 Tel: 1.415.773.5700 / Fax: 1.415.773.5759
PETER A. BICKS (*pro hac vice*)
6 pbicks@orrick.com
LISA T. SIMPSON (*pro hac vice*)
7 lsimpson@orrick.com
51 West 52nd Street, New York, NY 10019
8 Tel: 1.212.506.5000 / Fax: 1.212.506.5151

9 BOIES, SCHILLER & FLEXNER LLP
DAVID BOIES (*pro hac vice*)
10 dboies@bsflp.com
333 Main Street, Armonk, NY 10504
11 Tel: 1.914.749.8200 / Fax: 1.914.749.8300
STEVEN C. HOLTZMAN (SBN 144177)
12 sholtzman@bsflp.com
1999 Harrison St., Ste. 900, Oakland, CA 94612
13 Tel: 1.510.874.1000 / Fax: 1.510.874.1460

14 ORACLE CORPORATION
DORIAN DALEY (SBN 129049)
dorian.daley@oracle.com
15 DEBORAH K. MILLER (SBN 95527)
deborah.miller@oracle.com
16 MATTHEW M. SARBORARIA (SBN 211600)
matthew.sarboraria@oracle.com
17 RUCHIKA AGRAWAL (SBN 246058)
ruchika.agrawal@oracle.com
18 500 Oracle Parkway,
Redwood City, CA 94065
19 Tel: 650.506.5200 / Fax: 650.506.7117

20 *Attorneys for Plaintiff*
ORACLE AMERICA, INC.

21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 ORACLE AMERICA, INC.
25 Plaintiff,
26 v.
27 GOOGLE INC.
28 Defendant.

Case No. CV 10-03561 WHA
**DECL. OF ANDREW D. SILVERMAN
RE ADMIN. MOT. TO FILE UNDER
SEAL RE ORACLE'S RESPONSE TO
ECF NO. 1598**

Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

I, Andrew D. Silverman, declare and state as follows:

1. I am a member of the bars of the States of California, New York, and the District of Columbia, admitted to practice before this Court, and an associate with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”), attorneys of record for plaintiff Oracle America, Inc. (“Oracle”). I am familiar with the events, pleadings and discovery in this action and, if called upon as a witness, I could and would testify competently to the matters stated herein of my own personal knowledge.

2. I submit this declaration in support of Oracle’s Administrative Motion to File Under Seal Re Oracle’s Response to ECF No. 1598 (“Response”).

3. Google has designated the following portions of Oracle’s Response as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL—ATTORNEYS EYES ONLY” pursuant to the Protective Order:

Page/Line Number	Text to be Sealed
p. 5, lines 11-12	Text within the parenthetical after the citation to Astrachan Depo.
p. 6, lines 9-11	Text within the parenthetical after the citation to Rubin 4/5/11 Depo.
p. 6, lines 22-24	Text within the parenthetical after the citation to Rubin 4/5/11 Depo.
p. 7, lines 13-14	Text within the parenthetical citations reflecting the identity of the presentation recipients
p. 7, lines 15-16	Text within quotations after “it.”
p. 7, line 22	Text within the citation parentheticals
p. 8, lines 22-24	Text after the word “market” on line 22
p. 10, lines 3-4	Text after “ <i>Id.</i> ” on line 4

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 11th day of April, 2016, at New York, NY.

/s/ Andrew D. Silverman

Andrew D. Silverman